

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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PROPOSED ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

Objection Deadline: June 6, 2023

Hearing Date and Time:

June 13, 2023 at 10:00 a.m.

**NOTICE OF DEBTOR'S MOTION FOR AN ORDER
AUTHORIZING IT TO ENTER INTO AN EXPENSE REIMBURSEMENT
AGREEMENT WITH AD HOC COMMITTEE OF SUPPORTING COUNSEL**

PLEASE TAKE NOTICE that, on June 13, 2023 at 10:00 a.m. (prevailing Eastern Time) or as soon thereafter as counsel may be heard, LTL Management LLC, the

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

above-captioned debtor (the “Debtor”) by and through its proposed counsel, shall move before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, at the United States Bankruptcy Court, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for the entry of an order, pursuant to 11 U.S.C. § 363(b) authorizing the Debtor to enter into an expense reimbursement agreement with the Ad Hoc Committee of Supporting Counsel (the “Motion”).²

PLEASE TAKE FURTHER NOTICE that, pursuant to D.N.J. LBR 9013-2, responsive papers, if any, must be filed with the Clerk of the Bankruptcy Court, Clarkson S. Fisher Courthouse, 402 East State Street, Trenton, New Jersey 08608, and served upon (a) the Debtor’s undersigned proposed counsel, (b) the proposed counsel to the Official Committee of Talc Claimants, (c) the PSA Law Firms on the Ad Hoc Committee, (d) the legal representative for future talc claimants and her proposed counsel, (e) the Office of the United States Trustee for the District of New Jersey, (f) counsel to the Debtor’s non-debtor affiliates, Johnson & Johnson Holdco (NA) Inc. and Johnson & Johnson and (g) any other party entitled to notice no later than seven (7) days prior to the hearing.

PLEASE TAKE FURTHER NOTICE that, unless an objection is timely filed and served, the Motion will be deemed uncontested in accordance with D.N.J. LBR 9013-3(d) and the relief may be granted without a hearing.

² Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.

Dated: May 23, 2023

WOLLMUTH MAHER & DEUTSCH LLP

/s/ Paul R. DeFilippo

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